

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

EARL CRUMPE, individually and on behalf of
all others similarly situated,

PLAINTIFF,

v.

TD BANK, N.A.,

DEFENDANT.

Civil Action No.: 1:25-cv-01566 (RMB)(SAK)

AMENDED DECLARATION OF
PERETZ BRONSTEIN

PERETZ BRONSTEIN, being duly sworn, declares under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following statements are true and correct to the best of his information and belief.

1. In accordance with the Text Order of Hon. Sharon A. King, U.S.M.J. dated April 8, 2025, I make this Amended Declaration in support of the motion made by Neil Grossman, a member of the bar of this Court and counsel in this action for the plaintiff, EARL CRUMPE, for an Order pursuant to Rule 101.1(c) of the Local Civil Rules of the United States District Court for the District of New Jersey granting me permission to appear and to participate *pro hac vice* as an attorney for the plaintiff in this action. I am not otherwise eligible for admission to practice before the United States District Court for the District of New Jersey.

2. I am a member of the firm of Bronstein, Gewirtz & Grossman, LLC, which has offices in New Jersey at 40 Calumet Avenue, Lake Hiawatha, New Jersey 07034 and in New York at 60 East 42nd Street, Suite 4600, New York, New York 10165.

3. I was admitted to the New York Supreme Court, Second Appellate Department, in 1986, and have been in good standing with that court ever since. The office maintaining a roll of

the members of that bar is the New York Supreme Court, Second Appellate Department, 45 Monroe Place, Brooklyn, New York.

4. I was admitted to the United States Court for the Eastern District of New York in 1992, and have been in good standing with that court ever since. The official maintaining the roll of the members of that court is the Clerk for the United States Court for the Eastern District of New York, who has an address at 225 Cadman Plaza East, Brooklyn, New York 11201.

5. I was admitted to the United States Court for the Southern District of New York in 1990, and have been in good standing with that court ever since. The official maintaining the roll of the members of that court is the Clerk for the United States Court for the Southern District of New York, who has an address at the United States Courthouse, 500 Pearl Street, New York, NY 10012.

6. I have read and am familiar with the Local Rules of the United States District Court for the District of New Jersey, the New Jersey Rules of Professional Conduct, and the Federal Rules of Civil Procedure.

7. There are no grievances or other disciplinary proceedings currently pending against me in any court.

8. I have never been reprimanded, suspended, placed on inactive status, otherwise disciplined, or disbarred by any court or administrative body, and I have never resigned from the practice of law before any court. I am not on the list of lawyers disqualified to appear before this Court.

9. I do not reside in New Jersey, I am not regularly employed in New Jersey, and I am not regularly engaged in business, professional or similar activities in New Jersey.

10. Since my admission to the New York bar in 1986, I have been in private practice, specializing in the field of commercial litigation.

11. I have previously worked with the movant, Neil Grossman, on numerous matters and have previously been admitted to the Superior Court of New Jersey and to this Court *pro hac vice* under Mr. Grossman's supervision and pursuant to his motion. Mr. Grossman and I have been law partners since July 2000.

12. I have been admitted to this Court *pro hac vice* with respect to a currently pending action, *Haley Williams v. Samsung Electronics America, Inc.*, Case No. 2:23-cv-00989 (EP) (JRA) and in that connection I have previously paid the NJ Lawyer's Fund for Client Protection's assessed fee for the calendar year 2025.

13. No previous application for the relief requested herein has been made.

14. I therefore respectfully request that the motion of Neil Grossman, a member of the bar of this Court, for permission for me to appear before this court and to participate *pro hac vice* as the attorney for the plaintiff be granted.

Executed on April 10, 2025

s/ Peretz Bronstein
Peretz Bronstein